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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 19-CR-00034-VC
)	
Plaintiff,)	UNITED STATES' NOTICE OF REBUTTAL
)	EXPERT TESTIMONY BY FBI COMPUTER
v.)	SCIENTIST JONATHAN JEONG
)	
RAMESH KRIS NATHAN,)	
)	
Defendant.)	

The United States hereby discloses, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and Federal Rule of Evidence 702, that it may proffer Federal Bureau of Investigation ("FBI") Computer Scientist Jonathan Jeong as a rebuttal expert witness at trial. Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G), the United States hereby identifies FBI Computer Scientist Jeong as an expert and describes his anticipated opinions and the bases and reasons for those opinions, as well as his qualifications, below.

Qualifications

Mr. Jeong is a Computer Scientist with the San Francisco Division of the FBI. He is currently embedded and assigned to two cyber squads that investigate cyber-criminal and national security threats

1 in the Northern District of California. His job duties include: (i) conducting digital forensic and
2 technical analyses; (ii) serving as a technical resource for investigative interviews, physical searches,
3 and investigative and operational actions; (iii) designing and implementing technical solutions; (iv)
4 interfacing with partner law enforcement and intelligence agencies; and (v) providing investigative
5 technical assistance to all squads and threats for the FBI's San Francisco Field Office. A copy of his
6 curriculum vitae is attached as Exhibit A to this notice.

7 Prior to joining the FBI, Mr. Jeong held multiple technical positions at Apple, Inc. and Google
8 LLC over the course of eighteen years. That included the following positions:

9 **1. Technical Security Program Manager, Global Security, Apple Inc. (2015 to 2021).**

10 Mr. Jeong provided technical solutions and support to Apple's Global Security personnel,
11 infrastructure, and all Security Operations Centers (SOC/GSOC) globally. His job
12 responsibilities included managing and executing domestic and international infrastructure
13 initiatives, materials procurement, logistics planning, design and implementation of new
14 standard operating procedures (SOPs) for technical infrastructure support, writing technical
15 documentation, participating in 24/7 on-call duties, and designing technical solutions and
16 providing support to non-standard requests, emergency requests, and sensitive and
17 confidential projects.

18 **2. Technical Operations Manager, Legal Investigations Support, Google LLC. (2010 to**

19 **2015).** Mr. Jeong served as the sole technical resource and Legal Assistant for Google's
20 Legal Investigations Support team. His primary duties included processing domestic and
21 international law enforcement legal process for user data for all Google products and
22 services, including providing personnel technical support, creating technical documentation
23 for a non-technical audience, and providing technical solutions and maintaining working
24 relationships with Google's Engineering, Operations, and Infrastructure teams.

25 In addition, Mr. Jeong holds multiple cybersecurity certifications, including Global Information
26 Assurance Certification ("GIAC") Certified Incident Handler, GIAC Open Source Intelligence, GIAC
27 Reverse Engineering Malware, and GIAC Security Essentials. Mr. Jeong is a certified FBI Digital
28 Extraction Technician ("DExT") Technician and Computer Analysis and Response Team ("CART")

1 Technician. Mr. Jeong has completed the FBI Computer Scientist Field Operations Basic Training at
2 the FBI Academy in Quantico, Virginia. Mr. Jeong obtained a Bachelor of Science in Computer
3 Science and Minor in Mathematics from San Jose State University. He has not testified as an expert
4 witness before.

5 **Bases and Reasons for Opinions**

6 Mr. Jeong's testimony and opinions are based upon his training and experience, publicly
7 available data, evidence gathered during the government's investigation, as well as testimony and
8 exhibits introduced at trial.

9 **Anticipated Testimony**

10 At trial, Mr. Jeong will explain what an Internet Protocol ("IP") address is, how they work, how
11 they are assigned to electronic devices, and how geolocation data corresponds to IP addresses. He will
12 testify that internet service providers ("ISPs") assign and/or allocate IP addresses to devices when users
13 connect devices to the internet. Mr. Jeong will testify that ISPs often lease large blocks of IP addresses
14 from Regional Internet Registries ("RIRs"), and that these IP allocations generally do not change
15 frequently. ISPs will generally operate multiple autonomous system numbers ("ASNs") that correspond
16 to specific IP address ranges. An autonomous system ("AS") is a collection of IP networks under the
17 control of a single organization. The name of the organization is generally public and can be used to
18 attribute an IP address to an organization, *e.g.*, a telecommunications provider. The technical term for
19 this is an "AS org." The identified ASNs from open-source research identify telecommunications
20 providers that operate in the reported corresponding geolocation region.

21 Mr. Jeong will state that geolocation data for IP addresses is generally considered by industry
22 standards to be accurate at the regional and country level. For example, the ARIN RIR serves the
23 United States, Canada, and parts of the Caribbean. The APNIC RIR serves the Asia-Pacific region. The
24 RIPE NCC RIR serves Europe, the Middle East, and Central Asia.

25 Mr. Jeong will testify that he relied upon open-source resources that are considered reliable in
26 the industry and by the FBI, including Censys and iplocation.net, to identify the country location and the
27 assigned ASNs associated with the IP addresses in the IP Address Comparison chart (Trial Ex. 236).

28 Mr. Jeong will further state that iplocation.net aggregates country location for IP addresses across

multiple open-source resources. The disclosed chart at Exhibit B summarizes the results from that investigation.

Mr. Jeong will also testify that the IP addresses in the IP Address Comparison chart (Trial Ex. 236) currently belong to telecommunications carriers and/or ISPs. ISPs and telecommunications providers generally sell connectivity to their networks, but do not offer infrastructure products or services that are required to run a Virtual Private Network (“VPN”) service. Thus, it is unlikely that the IP addresses identified in the Amazon Web Services (“AWS”) and Rocket Science Group LLC d/b/a MailChimp records belonged to a VPN provider. VPN providers typically rent or lease infrastructure from infrastructure providers such as DigitalOcean and generally not from telecommunications carriers. In addition, Mr. Jeong searched the IP addresses through open-source resources that are considered reliable in the industry and by the FBI, including ip2location.com and spur.us, to identify whether the IP addresses currently belong to any anonymization services. The disclosed chart at Exhibit B summarizes the results from that investigation.

Finally, Mr. Jeong will explain that to “remote-in” to a computer requires: (i) the necessary remote connectivity service(s) must be enabled or remote connectivity software must be installed and configured to accept incoming remote connections; (ii) access for a specific user account must be granted; and (iii) the individual remotizing in must know the IP address of the computer it wants to access remotely.

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DATED: April 21, 2025

Jonathan Jeong
FBI Computer Scientist

Respectfully submitted,

PATRICK D. ROBBINS
Acting United States Attorney

ROLAND CHANG
SARA E. HENDERSON
Assistant United States Attorneys

EXHIBIT A

CURRICULUM VITAE



Jonathan Jeong

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San Francisco, CA 94102
Phone: 415-553-7400

PROFESSIONAL EXPERIENCE

Feb 2021 – Present

Computer Scientist

FBI San Francisco Division
Federal Bureau of Investigation
San Francisco, CA

Squad embedded Computer Scientist assigned to two cyber squads working the Cyber Criminal and National Security threats. Assigned to multiple investigations with duties to include conducting digital forensic and technical analysis, serve as a technical resource in interviews, physical searches, and investigative/operational actions, design and implement technical solutions, interface with partner agencies, and provide investigative technical assistance to all squads/threats for the San Francisco field office.

May 2015 – Feb 2021

Technology Security Program Manager

Global Security
Apple Inc.
Cupertino, CA

Provide technical solutions and support to Global Security organization personnel, infrastructure, and all Security Operations Centers (SOC/GSOC) globally. Responsibilities include manage and execute domestic/international infrastructure initiatives, materials procurement, logistics planning, design and implementation of new standard operating procedures (SOPs) for technical infrastructure support, write technical documentation, participate in 24/7 on-call duties, and design technical solutions and provide support to non-standard/one-off requests, emergency requests, and sensitive/confidential projects.

Oct 2010 – May 2015

Technical Operations Manager

Legal Investigations Support
Google LLC
Mountain View, CA

Simultaneously serve as a Legal Assistant and as the sole technical resource for the team to develop a thorough understanding of the team's work and their technical needs. Primary duties on top of processing domestic/international law enforcement legal process for user data for all Google products/services include providing personnel technical support, creating technical documentation for non-technical audience, translating the team's business needs/requirements and providing technical solutions, and establish/maintain working relationships with Engineering, Operations, and Infrastructure teams.

Jan 2009 – Oct 2010

Operations Engineer

Corporate Operations Engineering
Google LLC

Mountain View, CA

Provide technical support to company personnel. Primary support resource to the Legal and Treasury departments. Duties include supporting domestic and international office expansions/relocations/turn-up's/decommissions, technical solutions design and implementation, logistics coordination, and equipment procurement.

May 2003 – Jan 2009

Datacenter Operations Technician

Hardware Operations
Google LLC
Mountain View, CA

Support internal and public-facing infrastructure in datacenter/server room/lab environments to include coordinating and executing expansions, relocations, turn-up's/decommissions. Primary duties also include creating technical documentation, participating in 24/7 on-call duties, conducting candidate interviews, onboarding/training new-hires, and supporting network infrastructure teams with off-business hours maintenance efforts, manage and audit access control lists to secured/sensitive locations, ensuring adherence to SOX compliance standards, technical solution design and implementation.

EDUCATION

Aug 1998 – May 2003

San Jose State University

San Jose, CA

Bachelor of Science, Computer Science
Minor in Mathematics

PROFESSIONAL TRAINING

Apr 2024	SANS SEC504 – Hacker Tools, Techniques, and Incident Handling
Jul 2023	SANS SEC497 – Practical Open-Source Intelligence
Apr 2022	SANS FOR610 – Reverse-Engineering Malware: Malware Analysis Tools and Techniques
Mar 2022	FBI Computer Scientist Field Operations Basic Training
Dec 2021	FBI Digital Extraction Technician (DExT)
Dec 2021	FBI Computer Analysis and Response Team (CART) Technician
May 2021	SANS SEC401 – Security Essentials

CERTIFICATIONS

Jan 2025	GIAC Certified Incident Handler
Nov 2023	GIAC Open Source Intelligence
Oct 2022	GIAC Reverse Engineering Malware
Dec 2021	FBI DExT Technician
Dec 2021	FBI CART Technician
Sep 2021	GIAC Security Essentials

EXHIBIT B

IP Address	Country	Provider	Autonomous System Number	Anonymization Service
157.51.14.245	India (IN)	157.51.0.0/17 via RELIANCEJIO-IN Reliance Jio Infocomm Limited, IN (AS55836)	AS55836	Unlikely
157.51.41.206	India (IN)	157.51.0.0/17 via RELIANCEJIO-IN Reliance Jio Infocomm Limited, IN (AS55836)	AS55836	Unlikely
157.51.5.41	India (IN)	157.51.0.0/17 via RELIANCEJIO-IN Reliance Jio Infocomm Limited, IN (AS55836)	AS55836	Unlikely
157.51.91.124	India (IN)	157.51.0.0/17 via RELIANCEJIO-IN Reliance Jio Infocomm Limited, IN (AS55836)	AS55836	Unlikely
188.29.165.249	United Kingdom (GB)	188.28.0.0/15 via H3GUK, GB (AS206067)	AS206067	Unlikely
79.79.246.145	United Kingdom (GB)	79.79.0.0/16 via TISCALI-UK TalkTalk Communications Limited, GB (AS9105)	AS9105	Unlikely
81.129.78.243	United Kingdom (GB)	81.128.0.0/12 via BT-UK-AS BTnet UK Regional network, GB (AS2856)	AS2856	Unlikely
81.136.250.50	United Kingdom (GB)	81.128.0.0/12 via BT-UK-AS BTnet UK Regional network, GB (AS2856)	AS2856	Unlikely
86.177.90.19	United Kingdom (GB)	86.128.0.0/10 via BT-UK-AS BTnet UK Regional network, GB (AS2856)	AS2856	Unlikely